



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD

CHICAGO, IL 60604-3590

K.3  
1/12/99

REPLY TO THE ATTENTION OF

January 12, 1999

SR-6J

Ms. Louise Fabinski  
Agency for Toxic Substances and Disease Registry  
77 West Jackson  
Chicago, IL 60604

Dear Louise:

This letter is in response to your request for review by the United States Environmental Protection Agency-Region 5 (U.S. EPA) of the Initial Release of the Public Health Assessment-National Lead Industries/Taracorp Lead Smelt Site dated October 26, 1998; the report was prepared by the Illinois Department of Public Health (IDPH) under a cooperative agreement with the Agency for Toxic Substances and Disease Registry (ATSDR). As you know, U.S. EPA participated in a conference call on December 16, 1998, to discuss the above-mentioned report. Subsequent to the conference call, U.S. EPA sent to the IDPH the report of Dr. Allan H. Marcus "Statistical Analyses of Data from the Madison County Lead Study and Implications for Remediation of Lead-Contaminated Soil" which provides a basis for some of U.S. EPA's comments regarding the blood lead study. In the enclosure to this letter, U.S. EPA hereby provides written comments to the report.

Thank you for the opportunity to review this report and for the time extension for U.S. EPA's comments. Please contact Brad at (312) 886-4742 and/or Sheri at (312) 886-4745 if you have any questions concerning this comment letter. The U.S. EPA would appreciate being contacted if there is any disagreement regarding the comments pertaining to the interpretation of the Blood Lead Study data; this is an important issue for U.S. EPA and one for which U.S. EPA has solicited expert advice. As such, EPA would like to come to some conclusion on these issues, if possible.

Sincerely,

Brad Bradley  
Remedial Project Manager

Sheri Bianchin  
Remedial Project Manager

encl.

EPA Region 5 Records Ctr.



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cc: Dave Webb, IDPH  
Jeff Lybarger, ATSDR-Atlanta  
Alan Marcus, EPA-RTP

## Enclosure

### U.S. EPA Region 5 Comments on the Initial Release of the Public Health Assessment- National Lead Industries/Taracorp Lead Smelt Site dated October 26, 1998.

Below are U.S. EPA's comments:

1. **"Summary", Second Paragraph, second, third, and fourth sentences-** while it is true that there is some airborne lead at and around the NL Industries/Taracorp Site in Granite City, Illinois (the Site), since the smelter was shut down, the airborne lead levels have been well below the National Ambient Air Quality Standard for lead. Therefore, this pathway exists but is not a primary concern at the Site. The text should be changed accordingly.
2. **"Summary", Second Paragraph, fifth sentence-** the source of off-site lead contamination is primarily the result of historic smelter stack emissions, and secondarily due to fugitive dust. The text should be changed accordingly.
3. **"Summary", Second Paragraph, eighth, ninth, and tenth sentences-** at this location and throughout the assessment, any references to the 1991 Blood Study data should accurately reflect the data from said study. There are portions of the text from the 1991 Blood Study Report that are inaccurate. Specifically, whenever soil is mentioned as a contributor to blood lead levels in children, the contribution of soil to house dust is not mentioned. Also, lead paint did not explain more of the variation of the blood lead levels than any other factor. A more accurate summary of the data would be as follows: "House dust explained more of the variation of blood lead levels than any other factor (17%). Soil alone and paint alone each explained 3% of the variance in blood lead levels; however, both factors contribute significantly to lead levels in house dust." And, if needed, "Lead paint, along with the condition of the paint, explained up to 11% of the variation in blood lead levels." These corrections are needed to make the text accurate.
4. **Page 2, First Paragraph, fifth sentence** - add the following: "The ROD required cleanup of lead-contaminated soils and battery chips at residential properties, and at the industrial property along with capping of the Taracorp pile."
5. **Page 2, First Paragraph, sixth sentence-** add the following: "In September 1995, U.S. EPA issued a Decision Document/Explanation of Significant Differences."
6. **Page 2, First Paragraph, last sentence** - add *essentially* between the words *but* and *the*.
7. **Page 2, Third Paragraph-** Metallico, not Taracorp, is the current owner of the facility. This comment also applies to the last line on Page 2.
8. **Page 3, Third Paragraph, last sentence-** this sentence should be rewritten as follows: "As of late 1998, approximately 1100 properties had their soils remediated."

9. **Page 3, last three full sentences-** these sentences should be replaced with: "A chain link fence encloses the facility. The site has been accessible in the past through an open gate on the SLIR property; however, the gate is currently locked at night."

Due to continued industrial operations at the site, trespassing is unlikely."

10. **Page 4, Third Full Paragraph, second line-** "BV&G Transport" should be substituted for "Tri Cities Trucking".

11. **Page 5, Second Full Paragraph, fourth sentence-** "residential" should be inserted between "off-site" and "soils".

12. **Page 5, Second Full Paragraph, last sentence-** A more accurate statement would be "Public reaction was mixed on this remedial alternative. The majority of area citizens preferred full removal over capping of the Taracorp pile."

13. **Page 5, third-to-last sentence-** A more accurate statement would be "Based on public comments received, the citizens were split on the residential yard cleanup portion of the U.S. EPA's preferred remedial alternative, and the majority of citizens preferred full removal of the Taracorp pile over the capping remedy in the preferred alternative."

14. **Page 5, last sentence-** the end of this sentence should be changed to ".", with the addition of a ground water containment system."

15. **Page 20, First Full Paragraph, first sentence-** "historic smelter stack emissions and the" should be inserted between "the" and "waste".

16. **Page 20, First Full Paragraph, last sentence-** since the lead contamination from the NL Industries Site extends well beyond a ½ mile radius, especially northwest of the site, this sentence should account for the population within a one-mile radius of the Site as well, and perhaps even a 1 ½ mile radius.

17. **Page 20, Last Full Paragraph, third sentence-** this sentence should be reworded to reflect that past exposures were definitely higher than present, since the smelter was in operation and was emitting quantities of airborne lead that were well in excess of the NAAQS for lead. It should be noted that the primary source of air emissions and, thus, site-related airborne deposition in off-site areas, was the smelter stack. The waste piles also contributed through fugitive dust emissions, but were a secondary source of lead air emissions.

18. **Page 21, First Full Paragraph-** The following statement should be added to the end of this paragraph: "; however, the Taracorp pile is treated biannually with a dust suppressant."

19. **Page 22, First Full Paragraph, last sentence-** "when" should be substituted for "if", and

“are” should be substituted for “were”.

20. **Page 31, Fourth Paragraph**- once again, the contribution of soil to house dust is ignored in this paragraph. The statement regarding soil lead levels should be changed accordingly.

21. **Page 35, first two sentences**- these sentences should be replaced with : “The 500 parts per million residential soil cleanup level for lead was set by U.S. EPA. This level was chosen based on factors that are specific to the area around the smelter and the types of lead that were released to the environment from the smelter.”

22. **Page 36, Conclusion 1)** - same as comment #20. (It may also be worth noting that EPA believes many factors may affect blood study results and thus believes that they are one of many factors to use for consideration in selecting site remedies. )

23. **Page 36, Conclusion 2)**- provide the basis for this assertion. This statement is not made anywhere else in the text, and no basis is provided for this statement. The Report of Dr. Marcus concludes, based on the available data from the 1991 Blood Study, that paint is a more significant contributor to lead exposures in children further away from the smelter, and lead-contaminated soil is the more significant contributor to lead exposures in children closer to the smelter. This makes sense, and is supported by the data of the Blood Study.

24. **Page 36, Conclusion 3)**- this conclusion should be rewritten as: “Despite being treated with dust suppressants, the Taracorp pile is still exposed to wind and water erosion, which may add to the pre-existing contamination in areas where people may come into contact with this contamination.”

25. **Page 37, Recommendations**- Are the authors willing to recommend that soil cleanup should continue and that efforts should be made to address deteriorating lead-based paint? These recommendations seem fairly urgent and should be included at the beginning of the “Recommendations” section of the report.